

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE BP p.l.c. DERIVATIVE LITIGATION

)
) Case No. 06-cv-6168
)

**JAMES E. TULLMAN'S DECLARATION IN SUPPORT OF PLAINTIFFS'
MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTION TO DISMISS
PLAINTIFFS' SECOND AMENDED DERIVATIVE COMPLAINT**

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Co-Lead Counsel for Plaintiffs

JAMES E. TULLMAN, being duly sworn, deposes and says:

1. I am an attorney with the law firm of Weiss & Lurie, Co-Lead Counsel for Plaintiffs herein. I submit this declaration in support of Plaintiffs' Memorandum in Opposition to Defendants' Motion to Dismiss Plaintiffs' Second Amended Derivative Complaint.

2. Attached hereto as Exhibit A is a true and accurate copy of excerpts of the Botwinick Prize Acceptance Speech given by John Browne at Columbia Business School on November 17, 2004.

3. Attached hereto as Exhibit B is a true and accurate copy of BP's March 2007 20-F.

4. Attached hereto as Exhibit C is a true and accurate copy of the Companies Act 2006 Commencement Timetable dated February 28, 2006.

5. Attached hereto as Exhibit D is a true and accurate copy of Defendants' Memorandum in Support of Motion to Dismiss in Alaska.

6. Attached hereto as Exhibit E is a true and accurate copy of the U.S. Chemical Safety and Hazard Investigation Board's Investigation Report dated March 2007.

Pursuant to the provisions of 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 2nd day of April, 2007, at New York, New York.

/s/ James E. Tullman

JAMES E. TULLMAN